

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: D.I. 131, 281, 286 & 323

DECLARATION OF MICHAEL C. WHALEN

¹ The debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101) (collectively, the “Debtors”). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

I, Michael C. Whalen, declare:

1. I am an Associate at the law firm of Paul Hastings LLP, 71 South Wacker Drive, Suite 4500, Chicago, Illinois 60606, and counsel for Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC. I respectfully submit this declaration in support of the Reply in Further Support of Motion of Hon Hai Precision Industry Co., Ltd. (A/K/A Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases.

2. Attached hereto are true and correct copies of the following documents:

Exhibit	Description of Exhibit	Bates No.	Confidentiality Designation
A	April 2023 Presentation to the Board of Lordstown Motors Corp., April 21, 2023	DEBTORS_001252- DEBTORS_001298	Yes
B	May 25, 2023 Email and Attachment	FOXCONN- LMC_00000001- FOXCONN- LMC_00000004	Yes
C	Transcript of Deposition of Daniel Ninivaggi in <i>In re Lordstown Motors Corp.</i> , August 24, 2023	N/A	Yes
D	Lordstown Motors 13 Week Cash Flow Forecast, July 31, 2023	DEBTORS_000978 - DEBTORS_000979	Yes
E	Lordstown Motors Report regarding April 2023 Results, June 6, 2023	DEBTORS_001171- DEBTORS_001178	Yes
F	Transcript of Second Day Hearing in <i>In re Lordstown Motors Corp.</i> , July 27, 2023	N/A	No

Pursuant to 28 U.S.C. § 1746, to the best of my knowledge, information and belief, and after reasonable inquiry, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 25, 2023
Chicago, Illinois

/s/ Michael C. Whalen

Michael C. Whalen, Esq.
PAUL HASTINGS LLP